

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

UNITED STATES OF AMERICA <i>ex rel.</i>)	
KARI CRUTCHER,)	
)	
Plaintiff,)	Civil Action No. 16-CV-03812-
v.)	SCJ
)	
FIRST GUARANTY MORTGAGE)	
CORPORATION, PACIFIC)	
INVESTMENT MANAGEMENT)	
COMPANY, LLC, PIMCO)	
INVESTMENTS, LLC, AARON)	
SAMPLES, ANDREW PETERS, JILL)	
WINTER and SUZY LINDBLOM)	
)	
Defendants.)	
_____)	

MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING

Defendants Aaron Samples, Jill Winter, and Suzy Lindblom (hereinafter, “Defendants”), by and through undersigned counsel, hereby move pursuant to Federal Rules of Civil Procedure 6(b) and 7(b), Local Civil Rule 7.4, and Your Honor’s Rule III.B for an order granting Defendants an extension of time to file a responsive pleading in response to Plaintiff-Realtor Kari Crutcher’s (hereinafter, “Plaintiff”) Amended Complaint in the above-captioned matter.

The grounds for this motion are as follows:

Plaintiff filed a Complaint under seal on October 13, 2016. Plaintiff subsequently filed an Amended Complaint on June 29, 2022. After the United States of America declined to intervene in this action, the Amended Complaint was unsealed pursuant to court order dated August 30, 2022. Summons were issued as to Defendants Aaron Samples, Jill Winter and Suzy Lindblom on November 4, 2022. Jill Winter was served at her place of residence on November 4, 2022. Suzy Lindblom was served at her place of residence on November 5, 2022. Aaron Samples was served at his place of residence on November 8, 2022.

Defendants Samples, Winter and Lindblom recently retained undersigned counsel who will represent all three individuals in the above-captioned matter. A responsive pleading is due from Defendant Winter on November 25, 2022, from Defendant Lindblom on November 28, 2022, and from Defendant Samples on November 29, 2022. Defendants respectfully request an extension of time until December 16, 2022, to allow adequate time to investigate and respond to the Amended Complaint. Defendants' counsel contacted Plaintiff's counsel on November 22, 2022 and November 23, 2002 via email and telephone, but was unable to reach Plaintiff's counsel to obtain Plaintiff's position on this motion.

Dated: November 23, 2022

Respectfully submitted,

Potomac Law Group, PLLC
/s/ Christopher L. Meazell
Christopher L. Meazell
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*Attorneys for Defendants Aaron
Samples, Jill Winter, and Suzy
Lindblom*

CERTIFICATE OF SERVICE

I, Christopher L. Meazell hereby certify that on November 23, 2022, I filed the foregoing document using the Court's CM/ECF filing system which will send electronic notice to the registered participants as identified on the Notice of Electronic Filing.

/s/ Christopher L. Meazell
Christopher L. Meazell
Georgia Bar No. 500497